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Of Attorneys for Creditor

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF OREGON

In re

Eric L. Silva,

Debtor-in-Possession

Case No. 19-34037-pcm12

**PRECAUTIONARY OBJECTION TO
DEBTOR'S MOTION FOR FINAL
ORDER AUTHORIZING USE OF
CASH COLLATERAL OF DEBTOR-IN-
POSSESSION AND GRANTING
ADEQUATE PROTECTION**

PRECAUTIONARY OBJECTION

Creditor Paula Wolf ("Wolf") hereby makes this PRECAUTIONARY OBJECTION to Debtor-in-Possession Eric L. Silva's ("Debtor's") Motion for Final Order Authorizing Use of Cash Collateral of Debtor-in-Possession and Granting Adequate Protection (Docket #37); Creditor and Debtor, through counsel, are discussing the objections informally raised by Wolf and counsel for Debtor has advised that a subsequent motion 'down-grading' the cash collateral request to be heard on December 3, 2019 to one for emergency and interim relief will be filed prior to the Thanksgiving holiday. In reliance on the same, Wolf submits only this precautionary objection and notes that, just as with the Receiver (see Objection, Docket #41), the Debtor is also well aware of Wolf's status as a secured creditor, and Wolf should also receive Rule 7004 service of motion for use of Wolf's cash collateral. Based on counsel

for Debtor's representation that another cash collateral motion will be filed and served on all lienholders, Wolf reserves her rights to object to any non-emergency use of cash collateral.

DATED: November 26, 2019

VANDEN BOS & CHAPMAN, LLP

By: /s/Christopher N. Coyle
Christopher N. Coyle, OSB #073501
Of Attorneys for Creditor

In re Eric L. Silva

Chapter 12 Case No. 19-34037-pcm12

CERTIFICATE - TRUE COPY

I hereby certify that I prepared the foregoing copy of the foregoing named document and have carefully compared the same with the original thereof and it is a correct copy therefrom and of the whole thereof.

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was served on all CM/ECF participants through the Court's Case Management/Electronic Case File system on the date set forth below.

Dated: November 26, 2019

VANDEN BOS & CHAPMAN, LLP

By: /s/Christopher N. Coyle
Christopher N. Coyle, OSB #073501
Of Attorneys for Debtor